

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Deborah Seltzer

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Coach USA, Inc. and
Majesty Coach & Tours,
Inc., Dennis Rhoads
owner, Majesty Coach Tours,
Inc., John and Jane
Doe Bus Driver / operator,

COMPLAINT

Jury Trial: Yes No

(check one)

Defendants.

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Deborah Seltzer</u>
	Street Address	<u>500 Peconic Building 33, Apt 5B</u>
	County, City	<u>Lake Ronkonkoma, NY 11779</u>
	State & Zip Code	
	Telephone Number	<u>(631) 648-8385</u>

B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Coach USA, Inc.
 Street Address 750 Somerset Street
 County, City New Brunswick, NJ 08901
 State & Zip Code _____

Defendant No. 2

Name Majesty Coach & Tours, Inc.
 Street Address 3933 Perkiomen Avenue
 County, City Reading, Berks PA 19606
 State & Zip Code _____

Defendant No. 3

Name Dennis Rhoads, owner
 Street Address 3933 Perkiomen Avenue
 County, City Reading, Berks PA 19606
 State & Zip Code _____

Defendant No. 4

Name John And Jane Doe Bus Driver/operator
 Street Address 3933 Perkiomen Avenue
 County, City Reading, Berks PA 19606
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (check all that apply)

Federal Questions Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? N/A

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship NEW YORK

Defendant(s) state(s) of citizenship Pennsylvania, New Jersey

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? plaintiff injured in Alabama, but Plaintiff picked up in Bronx, New York. Defendants Contracted in New York.

B. What date and approximate time did the events giving rise to your claim(s) occur? August 3, 2014 or about Afternoon

What happened to you?

C. Facts: Plaintiff was a part of a group that contacted Coach USA Inc to hire a bus to go to Alabama and back. Plaintiff and group from New York. Also Coach USA Inc hired Majesty Coach & Tours, Inc to transport Plaintiff and Group. to Alabama.

Who did what?

Majesty Coach & Tours, Inc provided bus that had no air conditioning and broke down often. Majesty Coach caused a foreign substance to be on the stairs of the bus which caused Plaintiff to fall ~~very~~ slip and fall through no fault of Plaintiff but known or should have been known by Majesty & Coach defendants. Coach negligent in hiring Majesty. Majesty negligent, reckless, careless, wanton disregard for Plaintiff caused a dangerous situation and failed to warn Plaintiff of danger. Coach USA, Inc. knew or should have known of Majesty's low rating and reviews and hired them anyway. -3- Coach should have known Majesty buses break down and are kept in dangerous condition and failed to hire a good company.

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Plaintiff cause to have severe and serious personal injuries to her mind and body some are permanent in nature and required surgery in shoulder and leg. Pain and suffering plaintiff endured to frequent tears and medication. Plaintiff went to emergency and has been seeing an orthopaedic surgeon.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

Plaintiff is asking for an amount that exceeds \$75,000. Plaintiff is asking for \$3,000,000 in damages, medical past present and future and pain and suffering past present and future as well as attorney's fees and all money paid out.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this day of July 30, 2017.

Signature of Plaintiff Deborah Dill

Mailing Address 500 pecanic st Apt 33-523

Rocky Point, N.Y 11719

Home (631) 648-8385

Telephone Number (Cell) 347 886-3856

Fax Number (if you have one)

E-mail Address Dseltzer400@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this day of , 20 , I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____

Inmate Number _____